

**DEPARTMENT OF LABOR****Employment and Training  
Administration****DEPARTMENT OF EDUCATION****Office of Vocational and Adult  
Education; School-to-Work  
Opportunities Act; State  
Implementation Grants**

**AGENCIES:** Department of Labor and Department of Education.

**ACTION:** Notice Inviting Applications for New Awards for Fiscal Year (FY) 1995 and Notice of final selection criteria and a definition of administrative costs for School-to-Work Opportunities State Implementation Grants (State Implementation Grants) to be made in fiscal year 1995 and in succeeding years.

**SUMMARY:** The Departments of Labor and Education jointly invite applications for new awards in FY 1995. The Departments also announce final selection criteria to be used in evaluating applications submitted under the State Implementation Grants competition in FY 1995 and in succeeding years, authorized under section 212 of the School-to-Work Opportunities Act of 1994 (the Act). State Implementation Grants will enable States to implement their plans for statewide School-to-Work Opportunities systems. Such systems will offer young Americans access to programs designed to prepare them for a first job in high-skill, high-wage careers, and for further education and training. The Departments also announce a definition for the term "administrative costs" that will apply to State Implementation Grants funded under the Act.

**DATES:** The closing date for receipt of applications is June 19, 1995.

**SUPPLEMENTARY INFORMATION:****Background**

The Departments of Labor and Education are reserving funds appropriated for FY 1995 under the Act (Pub. L. 103-329) for a competition for State Implementation Grants authorized under section 212 of the Act.

This notice contains a definition of the term "administrative costs" and the selection criteria that will be used in evaluating applications submitted in response to this year's competition.

**Invitation for Application for New Awards**

*Purpose of Program:* These funds will serve as "venture capital" to allow States to build comprehensive School-

to-Work Opportunities systems which provide all youth with high-quality education that integrates school-based learning, work-based learning and connecting activities, prepares young Americans for success in high-skill, high-wage careers, and increases their opportunities for further education and training.

*Eligible Applicants:* All States that did not receive a State Implementation Grant in FY 1994, the District of Columbia, and Puerto Rico are eligible for Implementation Grants under this competition. In accordance with the School-to-Work Opportunities Act, the Governor must submit the application on behalf of the State.

*Deadline for Transmittal of Applications:* The closing date for receipt of applications is June 19, 1995, at 2 p.m. (Eastern Time). Telefacsimile (FAX) applications will not be honored.

*Availability of Applications:* Application packages will be mailed directly to both the Governor and the State School-to-Work Development Grant contact of each eligible applicant, as listed above. Applications will be mailed to applicants, via overnight mail, within one day of the publication of this notice in the **Federal Register**. Any other party interested in receiving a copy of the application package should contact: School-to-Work Office, 400 Virginia Avenue, S.W., Room 100-C, Washington, D.C. 20024. Telephone: (202) 401-6222.

*Available Funds:* Approximately \$86,000,000 (funding for the first twelve months).

*Estimated Range of Awards:* The Departments expect the minimum award to be approximately \$1.5 million and the maximum award to be approximately \$20 million. The Departments wish to emphasize that, in accordance with sections 212, 213, 214, and 216 of the Act, the actual amount of each award made under this competition will depend on such factors as the scope and quality of the State plan and application, the number of projected participants in programs operating within each State's School-to-Work Opportunities system, and the State's youth population. Therefore, the Departments strongly encourage applicants to consider these factors, the estimated average grant award amount, and the amount of awards made to the first eight Implementation States in deciding what funds to request. Applicants are discouraged from requesting significantly more funds than States with similar numbers of school-age youth received last year without a strong programmatic basis for doing so.

(Information on last year's awards is contained in the application package.)

*Estimated Average Size of Awards:* \$4.5 million.

*Estimated Number of Awards:* Up to 20.

**Note:** The Departments are not bound by any estimates in this notice.

*Project Period:* Up to 5 years (5 twelve-month grant periods).

*Applicable Regulations:* 29 CFR Parts 33, 93, 95, 96, 97, 98. The selection criteria and definition published in this notice, as well as the instructions contained in the application package and the eligibility and other requirements specified in the Act, apply to this competition.

*For Additional Information Contact:* Ms. Laura Cesario, U.S. Department of Labor, Employment and Training Administration, Division of Acquisition and Assistance, 200 Constitution Avenue NW., Room S-4203, Washington, D.C. 20210. Telephone: (202) 219-7300, extension 21 (this is not a toll-free number). Individuals who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1-800-877-8339 between 8 a.m. and 8 p.m., Eastern time, Monday through Friday.

Reference: SGA # DAA-007.

**Implementation Grant Competition***Analysis of Comments and Changes*

On March 10, 1995, the Departments of Labor and Education published a notice of proposed selection criteria and a proposed definition of the term "administrative costs" for this competition and competitions in succeeding years in the **Federal Register** (60 FR 13312-13315). In response to the invitation to comment, 55 parties submitted comments. An analysis of the comments received in response to the publication of that notice and of the changes made to the selection criteria and definition since publication of the notice of proposed criteria and proposed definition is published as an appendix to this notice.

*School-to-Work Opportunities State Implementation Grants***Definition**

All definitions in the Act apply to School-to-Work Opportunities systems funded under this and future State Implementation Grant competitions. Since the Act does not contain a definition of the term "administrative costs" as used in section 217 of the Act, the Departments will apply the following definition to this and future

competitions for State Implementation Grants:

The term "administrative costs" means the activities of a State or local partnership that are necessary for the proper and efficient performance of its duties under the School-to-Work Opportunities Act and that are not directly related to the provision of services to participants or otherwise allocable to the system's allowable activities listed in section 215(b)(4) and section 215(c) of the Act. Administrative costs may be either personnel costs or non-personnel costs, and direct or indirect. Costs of administration shall include, but not be limited, to:

A. Costs of salaries, wages, and related costs of the grantee's staff engaged in:

- Overall system management, system coordination, and general administrative functions;
- Preparing program plans, budgets, and schedules, as well as applicable amendments;
- Monitoring of local initiatives, pilot projects, subrecipients, and related systems and processes;
- Procurement activities, including the award of specific subgrants, contracts, and purchase orders;
- Developing systems and procedures, including management information systems, for assuring compliance with the requirements under the Act;
- Preparing reports and other documents related to the Act; and
- Coordinating the resolution of audit findings.

B. Costs for goods and services required for administration of the system;

C. Costs of system-wide management functions; and

D. Travel costs incurred for official business in carrying out grant management or administrative activities.

#### Selection Criteria

Under the School-to-Work Opportunities Implementation Grant competition, the Departments will use the following selection criteria in evaluating applications and will utilize a two-phase review process. In the first phase, review teams, including peers, will evaluate applications using the selection criteria and the associated point values. In the second phase, review teams, including peers, will visit high-ranking States to gain additional information and further assess State plans. The following selection criteria will apply to both review phases. The Departments will base final funding decisions on information obtained

during the site visits, the ranking of applications as a result of the first-phase review, and such other factors as replicability, sustainability, innovation, and geographic balance and diversity of program approaches.

#### Selection Criterion 1: Comprehensive Statewide System

*Points:* 35.

*Considerations:* In applying this criterion, reviewers will consider:

A. *20 points.* The extent to which the State has designed a comprehensive statewide School-to-Work Opportunities plan that—

- Includes effective strategies for integrating school-based and work-based learning, integrating academic and vocational education, and establishing linkages between secondary and postsecondary education;
- Is likely to produce systemic change in the way youth are educated and prepared for work and for further education, across all geographic areas of the State, including urban and rural areas, within a reasonable period of time.

• Includes strategic plans for effectively aligning other statewide priorities, such as education reform, economic development, and workforce development into a comprehensive system that includes the School-to-Work Opportunities system and support its implementation at all levels—State, regional and local;

• Ensures that all students will have a range of options, including options for higher education, additional training and employment in high-skill, high-wage jobs; and

• Ensures coordination and integration with existing local education and training programs and resources, including those School-to-Work Opportunities systems established through local partnership grants and Urban/Rural Opportunities grants funded under Title III of the School-to-Work Opportunities Act, and related Federal, State, and local programs.

B. *15 points.* The extent to which the State plan demonstrates the State's capability to achieve the statutory requirements and to effectively put in place the system components in Title I of the School-to-Work Opportunities Act, including—

- The work-based learning component that includes the statutory mandatory activities and that contributes to the transformation of workplaces into active learning components of the education system through an array of learning experiences, such as mentoring, job-shadowing, unpaid work experiences,

school-sponsored enterprises, supported work experiences, and paid work experiences;

• The school-based learning component that will provide students with high level academic skills consistent with academic standards that the State establishes for all students, including, where applicable, standards established under the Goals 2000: Educate America Act:

- A connecting activities component to provide a functional link between students' school and work activities and employers and educators; and
- A plan for an effective process for assessing students' skills and knowledge required in career majors, and the process for issuing portable skill certificates that are benchmarked to high quality standards such as those the State establishes under the Goals 2000: Educate America Act, and for periodically assessing and collecting information on student outcomes, as well as a realistic strategy and timetable for implementing the process.

#### Selection Criterion 2: Commitment of Employers and Other Interested Parties

*Points:* 15.

*Considerations:* In applying this criterion, reviewers will consider:

• The extent to which the State has obtained the active involvement of employers and other interested parties listed in section 213(d)(5) of the Act, such as locally elected officials, secondary schools and postsecondary educational institutions (or related agencies), business associations, industrial extension centers, employees, labor organizations or associations of such organizations, teachers, related services personnel, students, parents, community-based organizations, rehabilitation agencies and organizations, registered apprenticeship agencies, local vocational educational agencies, vocational student organizations, State or regional cooperative education associations, and human service agencies, as well as State legislators.

• Whether the State plan demonstrates an effective and convincing strategy for continuing the involvement of employers and other interested parties in the statewide system, such as the parties listed in section 213(d)(5) of the Act, as well as State legislators.

• The extent to which the State plan proposes to include private sector representatives as joint partners with educators in the oversight and governance of the overall School-to-Work Opportunities system.

- The extent to which the State has developed strategies to provide a range of opportunities for employers to participate in the design and implementation of the School-to-Work Opportunities system, including membership on councils and partnerships; assistance in setting standards, designing curricula and determining outcomes; providing worksite experience for teachers; helping to recruit other employers; and providing worksite learning activities for students, such as mentoring, job-shadowing, unpaid work experiences, supported work experiences, and paid work experiences.

### **Selection Criterion 3: Participation of All Students**

*Points:* 15.

*Considerations:* In applying this criterion, reviewers will refer to the definition of the term "all students" in section 4(2) of the Act and consider:

- The extent to which the State will implement effective strategies and systems: to provide all students with equal access to the full range of program components specified in sections 102 through 104 of the Act and related activities such as recruitment, enrollment and placement activities; and to ensure that all students have meaningful opportunities to participate in School-to-Work Opportunities programs.

- Whether the plan identifies potential barriers to the participation of any students, and the degree to which the plan proposes effective ways of overcoming these barriers.

- The degree to which the State has developed realistic goals and methods for assisting young women to participate in School-to-Work Opportunities programs leading to employment in high-performance, high-paying jobs, including nontraditional jobs and has developed realistic goals to ensure an environment free from racial and sexual harassment.

- The feasibility and effectiveness of the State's strategy for serving students from rural communities with low population densities.

- The State's methods for ensuring safe and healthy work environments for students, including strategies for encouraging schools to provide students with general awareness training in occupational safety and health as part of the school-based learning component, and for encouraging employers to provide risk-specific training as part of the work-based learning component.

**Note:** Experience with the FY 1994 School-to-Work Opportunities State Implementation Grant applications has shown that many

applicants do not give adequate attention to designing programs that will serve school dropouts and programs that will serve students with disabilities. Therefore, the Departments would like to remind applicants that reviewers will consider whether an application includes strategies to specifically identify the barriers to participation of dropouts and students with disabilities and proposes specific methods for effectively overcoming such barriers and for integrating academic and vocational learning, integrating work-based learning and school-based learning, and linking secondary and postsecondary education for dropouts and students with disabilities. Applicants are reminded that JTPA Title II funds may be used to design and provide services to students who meet the appropriate JTPA eligibility criteria.

### **Selection Criterion 4: Stimulating and Supporting Local School-to-Work Opportunities Systems**

*Points:* 15.

*Considerations:* In applying this criterion, reviewers will consider:

- The effectiveness of the State's plan for ensuring that local partnerships include employers, representatives of local educational agencies and local postsecondary educational institutions (including representatives of area vocational education schools, where applicable), local educators (such as teachers, counselors, or administrators), representatives of labor organizations or nonmanagerial employee representatives, and students, and others such as those included in section 4(11)(B).

- The extent to which the State assists local entities to form and sustain effective local partnerships serving communities in all parts of the State.

- Whether the plan includes an effective strategy for addressing the specific labor market needs of localities that will be implementing School-to-Work Opportunities systems.

- The effectiveness of the State's strategy for building the capacity of local partnerships to design and implement local School-to-Work Opportunities systems that meet the requirements of the Act.

- The extent to which the State will provide a variety of assistance to local partnerships, as well as the effectiveness of the strategies proposed for providing this assistance, including such services as: Developing model curricula and innovative instructional methodologies, expanding and improving career and academic counseling services, and assistance in the use of technology-based instructional techniques.

- The effectiveness of the State's strategy for providing staff development to teachers, employers, mentors, counselors, related services personnel,

and others who are critical to successful implementation of School-to-Work Opportunities systems for all youth.

- The ability of the State to provide constructive assistance to local partnerships in identifying critical and emerging industries and occupational clusters.

### **Selection Criterion 5: Resources**

*Points:* 10.

*Considerations:* In applying this criterion, reviewers will consider:

- The amount and variety of other Federal, State, and local resources the State will commit to implementing its School-to-Work Opportunities plan, as well as the specific use of these funds, including funds for JTPA Summer and Year-Round Youth programs and Perkins Act programs.

- The feasibility and effectiveness of the State's long-term strategy for using other resources, including private sector resources, to maintain the statewide system when Federal resources under the School-to-Work Opportunities Act are no longer available.

- The extent to which the State is able to limit administrative costs in order to maximize the funds spent on the delivery of services to students, as required in section 214(b)(3)(B) of the Act, while ensuring the efficient administration of the School-to-Work Opportunities system.

### **Criterion 6: Management Plan**

*Points:* 10.

*Considerations:* In applying this criterion, reviewers will consider:

- The adequacy of the management structure that the State proposes for the School-to-Work Opportunities system.

- The extent to which the State's management plan anticipates barriers to implementation and proposes effective methods for addressing barriers as they arise.

- Whether the application includes an evaluation plan containing feasible, measurable goals for the School-to-Work Opportunities system, based on performance measures contained in section 402(a) of the Act.

- The extent to which the evaluation plan includes an effective method for collecting information relevant to the State's progress in meeting its goals, and is likely to assist the State to meet its School-to-Work Opportunities system objectives, to gauge the success of the system in achieving those objectives, to continuously improve the system's effectiveness, and to contribute to the review of results across all States.

- Whether the plan includes a feasible workplan for the School-to-Work Opportunities system that

includes major planned objectives over a five-year period.

### Additional Priority Points

As required by section 214(a)(1) and (a)(2) of the Act, the Departments will give priority to applications that demonstrate the highest level of concurrence among State partners with the State plan, and to applications that require paid, high quality work-based learning experiences as an integral part of the School-to-Work Opportunities system by assigning additional points—above the 100 points described in the criteria—as follows:

#### 1. Highest Levels of Concurrence—5 Points

Up to 5 points will be awarded to applications that can—

- Fully demonstrate that each of the State partners listed in section 213(b)(4) concurs with the State School-to-Work Opportunities plan, and that the State partners' concurrence is backed by a commitment of time and resources to implement the plan.

#### 2. Paid, High-Quality Work-Based Learning—10 Points

Up to 10 points will be awarded to applications that demonstrate that the State—

- Has developed effective plans for requiring, to the maximum extent feasible, paid, high-quality work experience as an integral part of the State's School-to-Work Opportunities system, and for offering the paid, high-quality work experiences to the largest number of participating students as is feasible; and
- Has established methods for ensuring consistently high quality work-based learning experiences across the State.

**Program Authority:** 20 U.S.C. 6101 *et seq.*

Dated: May 15, 1995.

**Doug Ross,**

*Assistant Secretary for Employment and Training, Department of Labor.*

**Augusta Kappner,**

*Assistant Secretary for Vocational and Adult Education, Department of Education.*

### Appendix—Analysis of Comments and Changes

#### Definition of Administrative Costs

Comment: Three commenters suggested that public relations and evaluation were functions so central to the States' ability to implement systemic change that they should be excluded from the definition of administrative costs. One of the commenters also recommended excluding monitoring and developing systems for assuring compliance, for the same reason. One of these commenters suggested that first-year costs to establish these activities might be excluded, while maintaining the activities in future

years could be charged to administrative costs.

Discussion: The Departments agree that marketing (referred to as "public relations" in the notice of proposed selection criteria) and evaluation are key State system-building functions. Developing and maintaining a comprehensive statewide system will require change on the part of a great many organizations and individuals and the development of extensive partnerships at the State and local levels. Communicating the need for such change and challenging different groups to get involved—marketing—is an activity that is essential to achieving a School-to-Work Opportunities system. In addition, the evaluation function is especially critical because of the need for an ongoing process of measuring system effectiveness. The Departments believe, however, that monitoring and establishing compliance systems are activities more appropriately charged to the administrative cost category. The Departments expect that States will be providing extensive assistance to local partnerships to build their capacity to develop and implement local School-to-Work systems that meet the requirements of Title I. This process of forming and sustaining partnerships, which is addressed under Criterion 4, should be designed to help prevent compliance problems.

Changes: The activities related to marketing and evaluation against stated objectives have been deleted from the list of activities that must be included in the administrative cost category.

#### Restructuring Criteria

Comment: One commenter suggested restructuring the six criteria around the two major responsibilities of a State under School-to-Work Opportunities: (1) Developing and guiding a comprehensive statewide system; and (2) supporting the local School-to-Work Opportunities system. This commenter also recommended that the areas for which additional points could be awarded ("Highest Levels of Concurrence" and "Paid, High-Quality Work Experience") should, instead, be incorporated into one of the other criteria.

Discussion: The Departments agree that distributing the criteria around the two major responsibilities identified might be a useful alternative way to structure the criteria. However, other than repositioning the bullets, the recommendation did not include changing or deleting any of the bullets. In addition, the Departments do not agree that the areas for which additional points may be awarded could be incorporated into one of the selection criteria. Section 214 of the School-to-Work Opportunities Act of 1994 (the Act) requires that priority be given to applications that demonstrate the highest levels of concurrence among State partners and to applications that require paid, high-quality work experience. Subsuming these areas within other selection criteria is not consistent with the priority required by the Act. On balance, the Departments are confident that the current structure of the selection criteria adequately reflects the elements of a comprehensive State School-to-Work Opportunities system.

Changes: None.

### Selection Criterion 1: Comprehensive Statewide System (A)

#### Postsecondary Involvement

Comment: One commenter stated that the criteria did not address possible duplication of effort between School-to-Work Opportunities systems and programs established in public educational institutions, such as local community colleges. This commenter was concerned that localities might limit community college involvement, while favoring programs funded under the Department of Labor's Job Training Partnership Act. The commenter stated that the notice should include points for applications that promote the participation of local postsecondary institutions and community colleges, and also "should address local secondary school participation."

Discussion: The School-to-Work initiative is designed to unify categorical programs into coherent and comprehensive systems, and the Departments believe that the law and the notice adequately address duplication of effort. Coordination with, and integration of existing programs, including those in place in community colleges, is a key feature of School-to-Work Opportunities systems. An approved State plan must include strategies for effectively linking secondary and postsecondary education and the plan must describe coordination with programs funded under a range of authorities, including the Adult Education Act, the Perkins Act, the Elementary and Secondary Education Act (ESEA), and the Higher Education Act (see section 213(d)(6) of the Act). State partnerships must include State agency officials responsible for postsecondary education, and the notice awards priority points to applications that demonstrate partners' full concurrence with the School-to-Work Opportunities plan. Under Criterion 2: "Commitment of Employers and Other Interested Parties," applicants must describe the State's efforts to obtain and maintain the substantive participation of a range of stakeholders. In response to several comments, Criterion 2 has been changed to explicitly list the examples of interested parties as given in section 213(d)(5) of the Act, including secondary schools and postsecondary educational institutions, so that applicants are reminded of the range of organizations that might contribute to the effectiveness of the School-to-Work Opportunities system. Also in response to comments, Selection Criterion 4: "Stimulating and Supporting Local School-to-Work Opportunities Systems" now lists the required members of local partnerships as given in the Act, including local educational agencies and local postsecondary institutions, and applications must show how the State will assist communities in developing effective local partnerships. Given these specifications, the final notice makes it more explicit that only applications that demonstrate the genuine involvement of local secondary schools, community colleges, and other postsecondary institutions in their School-to-Work systems, will be competitive. While the Departments support State and

local flexibility in deciding which networks form the most appropriate base from which to expand School-to-Work Opportunities systems, the Departments also believe it is highly unlikely that an effective system can be built with only limited, selective participation of the stakeholders mentioned in the Act. In response to the comment about the need to address local secondary school participation, the Departments wish to stress that any application that under Criterion 1 B fails to present a convincing plan for institutional change in secondary schools statewide, will not be competitive.

Changes: None.

#### *Preparation for Entry Into Four-Year Colleges*

Comment: One commenter was concerned that comprehensive School-to-Work Opportunities systems would be associated with vocational education; the commenter believed vocational education is negatively viewed as yielding few academic skills, limiting postsecondary options, and limiting access to careers that require postsecondary education. The commenter believed that Criterion 1 should require reviewers to consider the extent to which plans ensure that all students graduating from secondary school will be "eligible" to enter four-year colleges.

Discussion: School-to-Work Opportunities systems must prepare learners for a range of education, employment and training options, as discussed throughout the Act and highlighted in the notice of proposed selection criteria in the first, second and fourth bullets of Criterion 1. School-to-Work aims at developing a lifelong continuum of learning and work experience, rather than targeting a specific type of institution or course of study. The Departments agree with the commenter on the need to emphasize to parents, students, and other stakeholders that School-to-Work Opportunities systems will not limit, but rather enhance, all students' capacity to master concepts and successfully enter and complete four-year degree programs. Since they utilize new methods of teaching, learning, assessing and demonstrating student achievement, School-to-Work Opportunities systems will also require flexibility and support from employers and four-year institutions for new methods of measuring student performance, such as skill certificates and portfolios. Although the Departments do not believe that a specific reference to "eligibility" for four-year colleges is necessary, they wish to stress that the success of student transitions will depend in part on the commitment of employers and postsecondary institutions to develop and accept new measures of student performance resulting from educational reform.

Changes: None.

#### *K-Adult Continuum*

Comment: One commenter suggested that language be added to support a State School-to-Work Opportunities plan that addresses all students, from K-Adult.

Discussion: The Departments believe that the criteria, as written, address life-long learning in many respects. Reviewers will evaluate the extent to which a State's

implementation plan integrates education and training programs and resources, including those which serve adults, such as postsecondary, continuing education, existing worker training and registered apprenticeship programs. Also, the Departments expect that a State's partnership will include a range of entities (see sections 213(b)(4) and 213(d)(5) of the Act), many of which relate directly to adult learners and workers. Finally, the most comprehensive plans for education reform will be strongly tied to related statewide initiatives such as economic development and workforce development, with School-to-Work as the framework for a K-Life continuum. Therefore, the Departments anticipate that the most competitive applications will address life-long learning implicitly in the implementation plan, or will achieve this integration in the long term.

Changes: None.

#### *Focus on Communities With High Concentrations of Poor and Disadvantaged Youth*

Comment: One commenter suggested that the second bullet of Criterion 1 A, which refers to the State's plan for systemic change, include specific mention of communities with high concentrations of poor and disadvantaged youth.

Discussion: The Departments believe that Criterion 1 A, by considering the extent to which the School-to-Work Opportunities system is likely to encompass and produce change in all areas statewide, addresses the inclusion of communities with high concentrations of poor and disadvantaged youth. Applications that do not outline convincing strategies and timelines for achieving comprehensive statewide coverage will be less competitive than those that do. In addition, the second bullet in the now-revised Criterion 4 places further weight on the State's plan to actively assist local partnerships in expanding the system to reach communities in all parts of the State. Reviewers will evaluate whether there are gaps in the strategy for implementing the School-to-Work Opportunities system throughout the State and score the application accordingly.

Changes: None.

#### *Apprenticeship Training*

Comment: One commenter expressed the view that apprenticeship training be included in Criterion 1 A with education reform, economic development, and workforce development, as statewide priorities in the establishment of a comprehensive system. The commenter also believed that the work-based learning component in Criterion 1 B should include, as a potential learning experience, early entry into apprenticeship training.

Discussion: In Criterion 1, "education reform," "economic development," and "workforce development" are broad terms that are intended to include a variety of programs and activities that may be part of a State's strategic priorities. The Departments believe that apprenticeship training is likely to be a key component in many comprehensive workforce development

strategies; however, they do not want to suggest that any specific program must be part of a State's workforce development initiative. In regard to the suggestion that early entry into apprenticeship training be included in the bullet on work-based learning on Criterion 1 B, the Departments agree that early entry into an apprenticeship program can be an appropriate objective for a School-to-Work Opportunities program. Section 215(b) (4) (K) of the Act includes, as an allowable activity for local partnerships receiving subgrants from States, the creation or expansion of school-to-apprenticeship programs in cooperation with registered apprenticeship agencies and apprenticeship sponsors. However, the extent to which apprenticeship training is utilized as a work-based learning experience in a statewide system is most suitably determined by the State.

Changes: None.

#### *System Change for Youth With Disabilities*

Comment: Several commenters recommended requiring special plans to demonstrate how School-to-Work Opportunities programs will be coordinated with "systems change grants" and other related activities under the Individuals with Disabilities Education Act (IDEA). In order to ensure participation by youth with disabilities, these commenters suggested that Criterion 1 A be revised to specifically reference IDEA transition projects or Systems Change for Youth with Disabilities.

Discussion: Achieving comprehensive reform will require States to coordinate and integrate a great number and variety of State initiatives having related goals. The Departments agree that the lessons learned from initiatives and programs that are related to School-to-Work should be incorporated into the State's comprehensive plan. The fifth bullet under Criterion 1 A is intended to encourage States to review the many related Federal, State and local programs and initiatives and develop strategies for creating mutually supportive strategies.

Changes: None.

#### **Selection Criterion 1: Comprehensive Statewide System (B)**

##### *Emphasis on Coordination With Goals 2000*

Comment: Several commenters expressed concern about the relationship between School-to-Work and the Goals 2000: Educate America Act. The commenters emphasized the voluntary nature of States' participation in Goals 2000 activities, and believed that the notice linked academic and skills standards too closely to these activities rather than focusing more broadly on statewide education reform initiatives. Conversely, one commenter stated that the criteria did not highlight strongly enough the importance of the State's role in developing curricula and instructional methodologies consistent with academic and skill standards such as those established under Goals 2000, nor in ensuring that students achieve these standards. One commenter noted that the use of the past tense in referring to standards "established" under Goals 2000 implies that States have submitted standards for certification by The National Education

Standards and Improvement Council. (The Council is provided for under Goals 2000, but has not been formed.) One commenter believed that the Goals 2000 standards apply only to traditional academic subject areas, disregarding core standards and performance measures for vocational and technical education already being developed by States under the Perkins Act, and separating academic performance from performance related to workforce-development. This commenter stated that a reference in Criterion 2 to employer involvement in the development of standards was the only linkage to the performance-based system being built under the Perkins Act.

Discussion: The Departments wish to clarify that participation in activities under both Goals 2000 and School-to-Work is strictly voluntary, and that participation in Goals 2000 is in no way a condition for receiving a School-to-Work Opportunities Implementation Grant. However, in the case of States that have chosen to participate in Goals 2000, the Departments will consider whether plans developed under School-to-Work and Goals 2000 are coordinated and mutually reinforcing. A major focus of Criterion 1 is the need to integrate School-to-Work into the State's overall agenda for education reform or restructuring. The Departments intend to emphasize the need for high, statewide standards against which to develop curriculum, measure the quality of integrated school-based and work-based learning and instruction, assess learner performance, and certify proficiency. The notice refers to standards developed under Goals 2000 as an example of such State-developed and validated measures. In response to the comment that Goals 2000, and, by association, this notice, disregards significant work already undertaken through the Perkins Act, the Departments would point out that under Goals 2000, participating States must coordinate their improvement plans both with any School-to-Work efforts and with strategies to integrate academic and vocational instruction as outlined in the Perkins Act. (See Goals 2000, section 306(j) and (1).) The School-to-Work Opportunities Act defines the integrated work-based and school-based components as incorporating, to the extent possible, all aspects of the industry, and providing academic, vocational, technical and production skills as well as general workplace competencies (see sections 4(1), 101 and 102 of the Act). Whether education reform and standards development occur independent from, or in relation to, the Goals 2000 initiative, it is important that the School-to-Work Opportunities plan unfold in the context of a systematic vision for improving education in the State.

Changes: None.

#### *Need To Include Sections of the Act in the Notice*

Comment: One commenter believed that the criteria should more exactly reiterate definitions and key components contained in the Act in section 4 ("Definitions") and Title I, sections 101-104 ("General Program Requirements" and basic program components), with specific points assigned

for elements such as those described in section 213 (d) ("State Plan") of the Act. The commenter also suggested that the Departments restore language, included in the Act but omitted from the final bullet of Criterion 1 B, linking career majors to the assessment and certification of skills. In the opinion of the commenter, the exclusion of this reference from the criterion altered the meaning of this section.

Discussion: While the Departments concur with the commenter on the importance of these provisions, they do not believe it is necessary to restate in the notice most of the legislative language emphasized by the commenter, or that it is necessary to assign points for every statutory requirement. The notice advises States that applications must meet all the requirements of the Act, reiterates that all definitions in the Act apply to systems funded under the State Implementation Grant competitions, and emphasizes, under Criterion 1, the need for State plans to demonstrate consistency with all statutory requirements and with all system components in Title I of the Act. Therefore, the Departments strongly encourage applicants to refer to the Act as well as the criteria in developing School-to-Work Opportunities plans which reflect the full intent of the law. The Departments wish to assure the commenter that panelists reviewing the applications are selected for their understanding of the School-to-Work Opportunities Act, are required to participate in a carefully designed orientation, and must score applications based on the criteria, in conjunction with the requirements of the Act. The Departments agree with the commenter that the bullet relating to assessment and certification of skills would be strengthened and clarified by including a reference to career majors, as given in section 213(d)(16) of the Act.

Changes: The final bullet in Criterion 1 B now includes the language of section 213(d)(16) of the Act regarding the State's process for assessing skills and knowledge required in career majors.

#### *Distribution of Points*

Comment: One commenter questioned the distribution of points in this section, and believed that Criterion 1 B, under Comprehensive Statewide System, should receive more weight than 15 out of 100 points. Another commenter recommended that the points assigned to Criterion 3, "Participation of All Students," be increased from 15 to 20.

Discussion: In response to this comment, the Departments gave careful consideration to the distribution of points among the selection criteria, and have concluded that the distribution provided for in the notice results in the most appropriate balance among the criteria.

Changes: None.

#### *Supported Work*

Comment: One commenter recommended adding supported work activities or experiences to several criteria to highlight what can be done at the work site to assist students with disabilities.

Discussion: The Departments agree that supported work activities, that provide

individualized support to assist persons with severe disabilities in becoming equal participants in the competitive labor force, can be appropriate elements of the work-based learning component.

Changes: In Criterion 1 B, the phrase "supported work activities" has been added to the list of learning experiences that may be included in work-based learning. In addition, in Criterion 2, the term "supported work experiences" has been added to the list of opportunities for employers' participation.

#### **Selection Criterion 2: Commitment of Employers and Other Interested Parties**

##### *Key Stakeholders*

Comment: Many commenters were concerned that by not specifically referencing organized labor as a party that should be actively involved in the development of the State system, as employers and State legislators are referenced, labor's contribution to the School-to-Work Opportunities initiative would be diminished. Various commenters also indicated that teachers, vocational rehabilitation agencies, JTPA service providers, community-based organizations, private non-profits, parents, and/or consumers should be explicitly identified as key stakeholders in the State system since the inclusion of these entities is as vital to the development of the system as that of employers.

Discussion: While the proposed criterion referenced section 213(d)(5) of the Act, which, in turn, explicitly lists the parties the State may involve in the creation of a statewide School-to-Work Opportunities system, the Departments agree that it would be helpful to identify expressly in the first bullet of Criterion 2 all of the parties referred to in section 213(d)(5). In this way, the criterion does not appear to exclude any of the entities that have significant contributions to make to the establishment of a comprehensive School-to-Work Opportunities system. Although the Departments believe that labor organizations have unique contributions to make to the design and implementation of School-to-Work Opportunities systems, Criterion 2 retains State flexibility to determine the involvement of specific interested parties listed in section 213(d)(5) of the Act. The Departments concur with the rationale expressed by several commenters that developing high-quality work-based learning experience requires the commitment of front-line workers as well as top-level managers and CEOs. Applicants are encouraged to utilize labor organizations and other key parties toward this aim.

Changes: Selection Criterion 2 has been changed to recognize all the entities listed in section 213(d)(5) of the Act.

##### *Involvement of Teachers*

Comment: One commenter believed that the involvement of teachers should be augmented beyond being listed among "other interested parties." This commenter recommended that teachers be designated as required sponsors of any grant application. This commenter, as well as one other, believed that applicants that articulate

convincing strategies to ensure effective and sustained teacher involvement at both the State and local levels should receive additional points.

Discussion: The Departments strongly encourage State teams to involve teachers at every stage of system development and implementation. A School-to-Work Opportunities system that does not effectively incorporate the needs, beliefs, and capabilities of classroom educators will not be able to reach the comprehensiveness required of system implementation. Additionally, strategies for building upon the current practices within a State will not be realistic or complete without the input of teachers. Although the Departments believe that teachers have unique contributions to make to the design and implementation of School-to-Work Opportunities systems, Criterion 2 retains State flexibility to determine the involvement of specific interested parties listed in section 213(d)(5) of the Act. Also, consistent with section 213(b)(4) of the Act, the Departments do not believe it is appropriate to mandate teacher sponsorship of the grant application. Finally, it is noteworthy that the importance of teachers' participation in School-to-Work Opportunities systems is further conveyed by the specific reference to teachers within the definition of "local partnership," in section 4(11)(A) of the Act. That section provides that local partnerships must include, among others, "local educators (such as teachers, counselors, or administrators) \* \* \*

Changes: As stated above, Criterion 2 now includes reference to each entity listed in section 213(d)(5) of the Act. Selection Criterion 4 has been changed to add, as its first bullet, the ability of the State to ensure that local partnerships include all of the entities listed in section 4(11)(A) of the Act.

#### *Consultation With Organized Labor*

Comment: Several commenters supported the addition of a requirement that the State directly consult with the State AFL-CIO in order to coordinate organized labor involvement at both the State and local levels. Many commenters supported this concept by requesting that the Departments require States to define a particular role for organized labor, tie this requirement to Criterion 2, and assign points to the requirement. Lastly, one commenter believed that it would be appropriate to include a special note requesting that States develop distinctive strategies to utilize organized labor.

Discussion: The Departments agree that organized labor is a key contributor to the development and implementation of comprehensive School-to-Work Opportunities systems. As many commenters suggested, labor organizations have significant contributions to make in a variety of aspects of such systems—from designating workplace mentors and helping to ensure safe work environments to the establishment of realistic skill standards. The Act thoroughly delineates who must collaborate in the development of a statewide system, as stated in section 213(b)(4) of the Act, which includes representatives of the private sector, as well as the other interested parties who are

encouraged to be involved, as stated in section 213(d)(5) of the Act which includes "labor organizations or associations of such organizations." The Departments do not believe that it is appropriate to mandate additional requirements beyond those contained in the Act or to define a role for any stakeholder group; however, strong applications will be those that represent the greatest amount of collaboration among stakeholders. Applicants are reminded that labor organizations or nonmanagerial employee representatives are required members of local partnerships in the School-to-Work Opportunities system, and, in response to another comment, Criterion 4 now identifies all required members of local partnerships.

Changes: None.

#### *Bureau of Apprenticeship and Training Involvement*

Comment: One commenter suggested that States designate a Federal Bureau of Apprenticeship and Training (BAT) representative as a State partner in order to avoid any duplication of effort between established apprenticeship programs and School-to-Work activities being developed as a result of the Act. The commenter referenced the Act's specificity with regard to non-duplication of effort.

Discussion: Section 213(d)(5) of the Act, referenced in Criterion 2, includes registered apprenticeship agencies as entities that States may actively and continually involve in the development and implementation of statewide systems. The term "registered apprenticeship agency" is defined under section 4(13) of the Act to mean "the Bureau of Apprenticeship and Training in the Department of Labor or a State apprenticeship agency recognized and approved by the Bureau of Apprenticeship and Training as the appropriate body for State registration or approval of local apprenticeship programs and agreements for Federal purposes." Since Criterion 2 has been changed to identify all entities listed in section 213(d)(5) of the Act, and since the Act includes the Bureau of Apprenticeship and Training in its definition of "registered apprenticeship agency," the Departments believe that the criteria adequately allow for the inclusion of the Bureau of Apprenticeship and Training in State system-building activities.

Changes: None.

#### **Selection Criterion 3: Participation of All Students**

##### *Participation of Target Groups*

Comment: Many commenters suggested ways to emphasize the participation of a particular target group or groups included in the definition of "all students." Some commenters recommended requiring specific strategies or plans for one or more of the target groups. Some believed that the "Note" on students with disabilities and dropouts was helpful, but that the concept of developing strategies for students with disabilities and school dropouts would be strengthened if it were added as a separate consideration in Criterion 3. One commenter wanted to add a "Note" reminding applicants

of the importance of nontraditional employment for women in School-to-Work and asking for identification of barriers and methods for overcoming them. One commenter suggested an alternative method for addressing the participation of all students. The commenter was concerned that assigning 15 points to a criterion that included all types of students might permit continuation of historical exclusionary practices because applicants could provide strong strategies for some students, but not include others and still be awarded high marks on this criterion.

While most of the comments relating to participation of target groups recommended requiring specific strategies for a particular target group, one commenter did not want to focus on any special group. This commenter believed that the strength of the School-to-Work Opportunities Act is that it is designed for all students, and that the system itself is the solution for different groups.

Recommendations for where in the notice changes should be made included Criteria 1, 3 and 4. Although most commenters wanted States to be required to provide more specific attention to a particular group in Criterion 3, several suggested adding language to the fourth bullet in Criterion 1A in order to correct past histories of exclusion or to help raise State awareness that the range of options should be available to a specific target group or groups. One commenter recommended adding language to Criterion 4 that would encourage States to help local systems use technology-based instructional techniques for students with disabilities. Another commenter recommended replacing Criterion 3 with what was referred to as a "threshold criterion."

Discussion: Criterion 3 requires a State to describe its strategies for effectively ensuring opportunities for all students to participate, and to identify ways of overcoming barriers to the participation of any students. The additional considerations in this criterion for young women and for students from rural communities with low population densities reflect the required content of the State plan, as described in section 213(d) of the Act. Balancing the design of a system that serves all students with the need for targeted strategies for some students is one of the most difficult aspects of implementing the School-to-Work Opportunities initiative. Like the Act, Criterion 3 refrains from requiring applicants to design specific programs for each specific group of students. Rather, the focus is on building a system for all students. The Departments agree that to receive the maximum points on Criterion 3 applicants must not neglect the needs of any students, and must convincingly describe how the State's School-to-Work Opportunities system will provide the same options and produce the same results for all participating students, while recognizing that groups of students have different needs and, therefore, that specific strategies may be required for the target groups listed in the definition of "all students." Applications that fail to address the critical needs of each category of student and fail to develop effective strategies based on identified student needs will not be as competitive as applications that have

comprehensive and effective strategies for all students. To be competitive, States that have not fully established all components of the strategies devised for all students, should have at least a timetable for putting all aspects of their strategies in place within a reasonable period of time. Finally, the Departments do not agree that Criterion 3 should be replaced with a threshold criterion or an eligibility requirement or that either of these would be consistent with the Act.

Changes: A reference to the definition of "all students" in section 4 of the Act has been added to Criterion 3 in order to remind applicants of the scope of the term.

#### *Define "All Students"*

Comments: Several commenters suggested that a definition of the term "all students" be added in the Definitions section of the Notice or that the specific student categories be defined. The commenters believed that the notice of final priority and selection criteria for the FY 1994 competition was clearer about the definition and that the significance of the requirement for "all students" needed to be emphasized.

Discussion: The final competition for State Implementation Grants in 1994 was announced prior to passage of the School-to-Work Opportunities Act. Consequently, it was necessary last year to provide more detailed information and definitions in the Notice—anticipating the School-to-Work Opportunities legislation—while ensuring consistency with Cooperative Demonstration authority of the Carl D. Perkins Vocational and Applied Technology Education Act, under which the FY 1994 State Implementation Grant awards were funded. For this second round of competitions, all definitions and requirements of the Act apply. However, the Departments agree that it would be helpful to remind applicants that the definition of the term "all students" applies to this competition.

Changes: A reference to the definition of "all students" in section 4(2) of the Act has been included in Criterion 3.

#### *Equal Access*

Comment: Two commenters recommended that Criterion 3 be expanded to include language requiring equal access to program components for all students. One of these commenters also recommended that Criterion 3 should require equitable representation of all students and equal access at the inception of the grant. The equal access language in Title I of the Act was considered by the commenter to be the cornerstone to ensuring participation of all students.

Discussion: Section 101 of the Act defines the general program requirements for all School-to-Work Opportunities systems and requires that they "provide students with equal access to the full range of such program components (including both school-based and work-based learning components) and related activities, such as recruitment, enrollment, and placement activities, except that nothing in the Act shall be construed to provide any individual with an entitlement to services under this Act." As noted elsewhere in this Appendix, applicants were reminded in the notice of proposed selection

criteria, and will be reminded in the final application package, that applications must meet all requirements of the Act. However, the Departments agree that the requirement for equal access is so central to the purpose of School-to-Work Opportunities, that applicants should be reminded that programs must provide equal access to the full range of program components to all students.

In regard to the comment suggesting that equal access be required from the inception of the grant, the Departments believe that some States may have an effective plan for a comprehensive School-to-Work Opportunities system even if all components of their plans, including their strategy for ensuring equal access to the full range of School-to-Work Opportunities program components, would not be fully operational at the beginning of the Implementation Grant period. However, in order to be competitive, a State should be able to: (1) Demonstrate an effective strategy for assisting all students to take advantage of the opportunities to fully participate in a School-to-Work Opportunities program that meets the requirements of Title I, and (2) describe the timetable for fully implementing the strategy.

Changes: Language from section 101(5) of the Act relating to equal access has been added to Criterion 3.

#### *Monitoring*

Comment: Several commenters recommended that State be asked to provide specific detail on how they plan to monitor the safe and healthy work environments that are required under section 601 of the Act. Some of these same commenters believed that joint labor-management safety committees and the State AFL-CIO should be consulted in designing the monitoring mechanisms.

Discussion: Under Criterion 3, reviewers will consider the State's methods for ensuring safe and healthy work environments for students. Many activities may be a part of a State's strategy for ensuring that students are provided safe and healthy work environments, including risk assessment, assignment of responsibility for safety, and monitoring. However, although the Departments do not believe it is appropriate for them to define the components of the strategy that all States must use to ensure safe and healthy work environments, the bullet has been modified to clarify that State strategies should include both school-based and work-based components.

Furthermore, while the Departments agree that labor-management safety committees would be in an excellent position to provide assistance in designing monitoring mechanisms, the School-to-Work Opportunities Act provides States with flexibility to develop and implement School-to-Work Opportunities systems that best fit the needs of the State, while meeting the requirements of the Act. Who is involved in designing pieces of the State's system will be determined by the State and local partners.

Changes: The final bullet of Criterion 3 has been modified to encourage safety training to be included in both the school-based and work-based components.

#### **Work Environment Free From Harassment**

Comment: One commenter recommended that States be required to explain how they will ensure that student work environments are free from racial and sexual harassment.

Discussion: The Departments agree that providing environments for students that are free from racial and sexual harassment is an important aspect of School-to-Work. Section 213(d)(14) of the Act directs States to describe the State's goals and methods for addressing the issues of participation in School-to-Work programs by young women. That section also requires States to describe their "goals to ensure an environment free from racial and sexual harassment." The purpose of publishing the "Notice of proposed selection criteria" was to provide an opportunity for comment on the criteria that reviewers would use in evaluating applications; it was not to repeat the entire contents of the State plans, as defined in section 213(d). However, the Departments agree with the commenter on the importance of the efforts of States and local partnerships to ensure that students are provided with work environments, free from racial and sexual harassment.

Changes: The phrase from section 213(d)(14) of the Act, "and has developed realistic goals to ensure an environment free from racial and sexual harassment," has been added to the third bullet under Criterion 3.

#### *Focus on Communities With High Concentrations of Poor and Disadvantaged Youth*

Comment: One commenter suggested that the section that deals with the State's strategy for serving students from rural communities with low population densities include a specific reference to communities with high concentrations of poor and disadvantaged youth.

Discussion: Since Criterion 3 considers the extent to which the School-to-Work Opportunities system is designed to reach all students, the Departments believe the notice adequately addresses the inclusion of such communities in the State's plan for implementing systemic change across all geographic areas of the State. Disadvantaged students are specifically noted in the Act's definition of "all students." (See section 4(2).) Applications that do not outline convincing strategies for including all students in the School-to-Work Opportunities system will be less competitive than those that do.

Changes: None.

#### *Alternative Assessments*

Comment: Several commenters noted the importance of providing flexibility in assessment processes. Some of these commenters suggested adding considerations to Criterion 3 that encourage the development of alternative assessment techniques and alternative methods of meeting skill benchmarks that do not penalize students for a deficit related to the assessment technique being utilized.

Discussion: The Act provides flexibility for States to design School-to-Work Opportunities systems that respond to the unique needs and opportunities of each

State. The State plan that is part of the application for a State Implementation grant must include a description of the State's processes for assessing skills and knowledge required in career majors and for awarding skill certificates. In addition, under Criterion 3, reviewers will assess the extent to which the applicant has identified barriers to the participation of any students.

Changes: None.

#### **Selection Criterion 4: Stimulating and Supporting Local School-to-Work Opportunities Systems**

##### *Stakeholder Involvement at the Local Level*

Comment: Two commenters suggested that States be asked to describe their efforts to involve organized labor at the local level, including recommended strategies for local areas to address labor market needs and build the capacity of their local partnerships by involving labor organizations during the early stages of initiative development. An additional commenter asked that States be required to ensure that local partnerships include students and community-based organizations in the development of local School-to-Work Opportunities systems.

Discussion: Section 4(11)(A) of the Act states that local partnerships must include: employers, representatives of local educational agencies and local postsecondary educational agencies (including representatives of area vocational education schools, where applicable), local educators (such as teachers, counselors, or administrators), representatives of labor organizations or nonmanagerial employee representatives, and students. In addition, section 215(c)(2) of the Act lists conducting "outreach activities to promote and support collaboration, in School-to-Work Opportunities programs, by businesses, labor organizations, and other organizations" as an activity in which the State may become involved in carrying out the statewide School-to-Work Opportunities system. Bearing these points in mind, the Departments believe that the most competitive State applications will contain strategies for local areas that promote high levels of local partnership collaboration and that can effectively demonstrate an awareness of a local partnership's capability for inclusion of all parties necessary for local initiative implementation and correlation to the statewide system.

Changes: Selection Criterion 4 now includes, as its first bullet, the ability of the State to ensure that local partnerships include all of the entities listed in section 4(11)(A) of the Act.

##### *Staff Development*

Comment: Two commenters requested that staff development be included in Criterion 4. One commenter focused on requiring States to set aside resources and develop a long-term plan for providing staff development activities to all staff members within secondary schools. The other commenter indicated that State applications should be assessed based upon their efforts to provide training for teachers, employers, mentors, counselors, and other staff that includes specialized training directed toward

preparing women, minorities, and individuals with disabilities for jobs in high-skill, high-wage industries.

Discussion: The Departments agree with both commenters and believe that the most competitive State applications will include strategies for providing staff development for all who are involved in the provision of School-to-Work activities for youth. Section 213(d)(7) of the Act expressly requires that States articulate strategies for training teachers, employers, mentors, counselors, related services personnel, and others, including specialized training to prepare staff to effectively support special student populations such as women, minorities, and individuals with disabilities. Two other sections in the Act, section 104 (with regard to the connecting activities component) and section 215(b)(4) (with regard to allowable activities under State subgrants), underscore the training of teachers, mentors, and others as vital components of any School-to-Work Opportunities initiative. Since the Act so strongly emphasizes the critical importance of staff development in the implementation of statewide systems, and further emphasizes the need for staff development at the local level, the Departments are adding explicit language that compels reviewers to consider the extent to which states have provided for staff development for all staff involved in the provision of School-to-Work activities for youth.

Changes: Selection Criterion 4 now includes an additional bullet that considers the effectiveness of the State's strategy for providing staff development to those who are critical to successful implementation of School-to-Work Opportunities systems for all youth.

#### **Criterion 6: Management Plan**

##### *Evaluation*

Comment: Several commenters were concerned that an evaluation plan was not specifically required in State applications. The commenters indicated that the presence of a concrete plan for research and evaluation would help gauge a State's ability to measure the success of, and to continuously improve, its School-to-Work Opportunities system. Several commenters pointed out that the resulting information could be used to systematically assess the impact of School-to-Work systems, avoid duplication, identify issues, challenges and best practices, and provide models for replication. One commenter recommended that grantees collect data on the number of exiting participants who are gaining employment and/or entering and completing post-secondary education or training. One commenter stated that performance measures are more than a management issue, and should be considered under Criteria 1 and 4.

Discussion: The Departments believe that States should have the flexibility to design evaluations appropriate to State needs and goals, but they agree on the importance of a plan that presents how a State will collect and analyze information related to the performance measures in section 402 of the Act, as well as any other factors the State deems necessary. Since the Departments are required to conduct an evaluation of all

systems funded under the Act, information on the impact of School-to-Work will be gathered. (See sections 401–404.) The Departments believe that the notice sufficiently emphasizes the significance of performance measures. However, the Departments agree with the commenters that Criterion 6 should relate performance measures and data collection methods to a systematic evaluation plan. Reviewers will consider first, whether such a plan is in place, second, the extent to which it is likely to meet State objectives, third, the extent to which it will be used to gauge the success of, and continuously improve, the State's School-to-Work system, and fourth, the extent to which the State's evaluation plan is likely to contribute to the review of results across all States.

Changes: Criterion 6 has been changed to add the words "evaluation plan" as the vehicle for including measurable goals, and to include in the bullet the ability of the evaluation plan to meet State objectives, continuously improve the State system, and contribute to the review of results across all States.

##### *Addressing Potential Barriers*

Comment: One commenter proposed involving organized labor to address the potential barrier of providing all students with work-based learning experiences. The commenter believed that the early inclusion of "member employers of organized labor" would ensure full participation of students in the School-to-Work Opportunities initiative.

Discussion: The Departments encourage States to involve representatives of organized labor and others in addressing such potential barriers as providing all students with work-based learning experiences. As stated in reference to Criterion 2, the Departments have agreed to identify each of the entities listed in section 213(d)(5) of the Act as stakeholders important to the implementation of the statewide School-to-Work Opportunities system. The Departments encourage the utilization of each of these entities, including organized labor, in identifying and addressing potential barriers to student participation and view the change to Criterion 2 as addressing this commenter's concerns as well.

Changes: None.

#### **Additional Priority Points [1]—Highest Levels of Concurrence**

##### *Highest Levels of Concurrence*

Comment: Three commenters made recommendations for change to the section of the Notice on additional priority points for Highest Levels of Concurrence. One commenter requested that, in addition to awarding priority points for concurrence of the State partners, a penalty for nonconcurrence should be applied. Another commenter believed that five additional priority points for this criterion was not appropriate because the basis for assigning the additional points was not clear, and it would be difficult for reviewers to differentiate between perceived and actual collaboration. Another commenter believed that this section should be revised to encourage States to utilize staff who are

qualified to deliver services to special population groups.

Discussion: In response to the first comment, the Departments note that reviewers may add a maximum of 5 points for applications that demonstrate that all State partners listed in section 213(b)(4) concur with the plan and have committed time and resources to implementing it. Applications that do not fully demonstrate such concurrence will receive less than 5 points, which is, in effect, a penalty for nonconcurrence, as the commenter suggested. Regarding the second suggestion, the Departments note that the basis for awarding 5 additional points for "Highest Levels of Concurrence" is adequately described. To assist reviewers in differentiating between perceived collaboration and actual collaboration, applicants must show how the concurrence of each partner is actualized through a commitment of time and resources. Regarding the third suggestion, section 214(a) of the Act specifies that priority is to be given for concurrence with the State plan by those organizations listed in section 213(b)(4) that are required to collaborate in the development of the application. This section of the Act is a recognition that system-wide change cannot occur unless the State officials with the authority and resources for related education and training programs fully commit to system-wide change. How effectively local School-to-Work Opportunities programs or activities are *delivered* is a consideration in several other criteria, including Criteria 3, 4, and 6.

Changes: None.

#### **Additional Priority Points [2]—Paid, High Quality Work-Based Learning**

##### *Difficulty of Rural States in Meeting Priority*

Comment: Several commenters were concerned that this section would favor urban, industrialized States over rural non-industrialized States because the former have greater numbers of employers able to provide paid work experiences. While one commenter agreed with placing some emphasis on paid, high-quality work-based learning, most of these commenters pointed out that rural States have limited access to employers due to factors such as geographic isolation, predominance of small businesses, and a smaller base of non-hazardous industry. Two commenters noted that the Act describes paid work experience as a

preferred, but not mandatory, activity of School-to-Work Opportunities systems, indicating that a ten-point priority for this factor exceeds the intent of the law. Other commenters noted that many rural School-to-Work Opportunities systems will rely mainly on school-sponsored enterprises, school-based simulations and unpaid work-based learning, and that students also benefit from these experiences. One commenter suggested that more information be provided in this section on what constitutes high-quality work-based learning. One commenter suggested that points be reduced under this section, and additional points be awarded for rural School-to-Work strategies under Criterion 3.

Discussion: The Departments are committed to a fair and equitable review of all applications, and recognize that, in order to be successful, a School-to-Work Opportunities system must take into account the unique needs and conditions of the State by which it has been designed. The Departments agree that unpaid work experiences and alternatives such as school-sponsored enterprises are highly valuable in providing students with the opportunity to gain and apply skills. This priority does not require paid work experience for every student, but emphasizes paid work experience in the work-based learning component, and rewards applications which demonstrate innovative strategies and high levels of effort in this area. The Departments wish to clarify that this section will not place rural States at a disadvantage, since points awarded will reflect comprehensiveness in developing the work-based learning component and attempting to maximize paid work experiences, rather than the relative number of students involved in paid work experiences. Reviewers rank each State's application against the criteria, not against other applications. In assigning points under this priority, reviewers will consider the quality of an individual State's plan given what is feasible for that State, as described in the application. Therefore, the extent to which an application presents what is possible and appropriate for the State, as well as the State's level of effort in obtaining paid work experiences and/or designing high-quality alternatives which are accessible systemwide, will determine the number of points awarded. Rural States that present this information thoroughly and convincingly may score higher in this section than urban States that do not demonstrate initiative in

developing the work-based component. While the Departments encourage applicants to review section 103(a) of the Act for a definition of high-quality work-based learning, they do not believe this definition needs to be restated in the priority.

Changes: None.

#### **Invitation to Comment**

##### *30 Day Submission*

Comment: Several commenters opposed the Departments' decision to require States to submit their applications within 30 days of the publication of the notice of final selection criteria. Generally, these commenters believed that 60 days, rather than the proposed 30 days, would allow enough time for States to involve and obtain support from all of the necessary stakeholders in the submission of the State application. Three commenters added that the proposed submission time prevents full consultation with regional or local stakeholders located throughout the State (particularly large States). Commenters further noted that the proposed 30 day submittal deadline limits the ability of State educational agencies and others who may have dissenting comments to provide them, disregards the fact that May is a difficult time to obtain comments from classroom teachers, and would nonetheless be unsuccessful in granting awards prior to the beginning of the 1995 school year.

Discussion: While the Departments understand the requests by some States for additional time to submit their applications, they strongly maintain that, as stated in the notice of proposed criteria, the 30 day submittal time is sufficient for States that are prepared for comprehensive system implementation. Furthermore, the involvement of necessary stakeholders in the endorsement of the State application's key components should either already be established or be well underway and would not likely be increased with the addition of 30 days. Lastly, the establishment of the Departments' *State Planning Guide for a Comprehensive System*, distributed shortly after the publication of the proposed criteria, provided States with an opportunity to evaluate their current progress and assess the status of all system components.

Changes: None.

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